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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN TYLOR HERRA,

Defendant.

No. 3:25-cr-00032-SLG-MMS

COUNT 1

SEXUAL EXPLOITATION OF A CHILD
– POSSESSION AND ACCESS WITH
INTENT TO VIEW CHILD
PORNOGRAPHY

Vio. of 18 U.S.C. § 2252A(a)(5), (b)(2)

CRIMINAL FORFEITURE
ALLEGATION

18 U.S.C. § 2253 and 28 U.S.C.
§ 2461(c)

INFORMATION

The United States Attorney charges that:

COUNT 1

Beginning on a date unknown, but no later than April 24, 2025, within the District of Alaska, the defendant, JONATHAN TYLOR HERRA, knowingly possessed and knowingly accessed with intent to view any computer disk and any other material that

contained images of child pornography, as defined in 18 U.S.C. § 2256(A) and (C), which had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials which have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

It is further alleged that an image of child pornography involved in the offense involved a prepubescent minor, and a minor who had not attained 12 years of age.

All of which is in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Counts 1-2 are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

Upon conviction of the offenses in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as set forth in Count 1 of this Information, the defendant, JONATHAN TYLOR HERRA, shall forfeit to the United States pursuant to 18 U.S.C. § 2253 any property, real or personal, that was used or intended to be used to commit or to promote the commission of such violations or any property traceable to such property, including, but not limited to:

- Motorola GSM cellular device
- Black Samsung tablet, Model: SM-T377V

All pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

RESPECTFULLY SUBMITTED May 15, 2025, At Anchorage, Alaska.

MICHAEL J. HEYMAN
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s/ Ainsley McNerney
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